## UNITED STATES OF AMERICA DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

V. No. 04-10129-RCL

MARK A. MCARDLE

## FURTHER INFORMATION FOR THE COURT CONCERNING THE DEFENDANT'S DETENTION STATUS

Now comes the defendant, Mark A. McArdle and seeks to provide the Court with additional information concerning his possible release as follows:

- 1. The defendant's brother, Brandon McArdle has agreed to post his home as surety. It is located at 72 Beach Road in Salisbury, Massachusetts. The home was recently refinanced and appraised. It is valued at \$325,000 and has a mortgage of \$255,000 thus providing \$70,000 in equity. In addition, Brandon McArdle would be willing to be a custodian for his brother. Brandon is married with two children. He drives a tractor trailer for the New England Motor Freight Company and has been employed there for three and a half years. His home represents the majority of his assets.
- 2. The defendant's girlfriend, with whom he resides, Jill Sasso, has already been interviewed by the probation department and is also willing to be a custodian for the defendant. The only property she has is a 401(k) which contains \$15,000. She is willing to post that account as surety with the Court.

- 3. The defendant owns a home in New Hampshire, which the Government has seized contending that it was purchased with drug funds. He would otherwise have posted this home as surety.
- 4. The defendant remains willing to comply with any conditions of supervision, including electronic monitoring, curfew, reporting weekly, daily, in person or by telephone and any other conditions the Court imposes.

Mark A. McArdle By His Attorneys

**CARNEY & BASSIL** 

/s/ Janice Bassil
Janice Bassil
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## Certificate of Service

I, Janice Bassil state that I have served the within motion upon James P. Geraghty Jones & Milligan, 80 Washington Square, Building J, Norwell, MA 02061,Lenore Glaser, 25 Kingston Street, 6th Floor, Boston, MA 02111-2022 and Michael J. Pelgro United States Attorney's Office, 1 Courthouse Way, Suite 9200,Boston, MA 02210 this 21<sup>st</sup> day of September, 2004 by United States mail. Signed under the pains and penalties of perjury.

/s/Janice Bassil
Janice Bassil

ANDY – CAN YOU FILE THIS FOR ME ELECTRONICALLY? ITS UNDER MCARDLE, MARK, addendum to detention – thanks jb